



Order Filed on May 25, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF THE UNITED STATES TRUSTEE
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In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No. 21-30589/MBK

Hearing Date: May 24, 2022 at 10 a.m.

Honorable Michael B. Kaplan, Chief Judge

ORDER COMPELLING COMPLIANCE WITH FED. R. BANKR. P. 2019

The relief set forth on the following page(s), numbered two (2) through four (4), is hereby **ORDERED**.

DATED: May 25, 2022



Honorable Michael B. Kaplan
United States Bankruptcy Judge

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Upon consideration of the Motion of the United States Trustee, by and through counsel, for an Order compelling compliance with Fed. R. Bankr. P. 2019; and notice of the motion having been given to the Debtor, Debtor's counsel and parties in interest, and the Court having found cause for the entry of the within Order, and the Court having further found that entry of the within Order is in the best interest of creditors and the bankruptcy estate:

It is hereby ORDERED:

1. The Motion is Granted.
2. Any and all attorney/law firms that represent multiple creditors in matters of common interest within the meaning of Fed. R. Bankr. P. 2019 in this Chapter 11 Case, to the extent they have not yet done so, shall file with the Court a Fed. R. Bankr. P. 2019 disclosure within fourteen (14) days of the entry of this Order.
3. The 2019 Statement for a group or committee of personal injury claimants may be filed under seal and shall be a verified statement identifying the name and address of the entity filing such statement, that complies in all respects with Fed. R. Bankr. P. 2019(c), and shall include the following specific information:
 - a. An actual copy, or exemplar represented to be substantially the same in form and substance, of each form of agreement or instrument whereby such entity is empowered to act on behalf of creditors or equity security holders in these cases, redacted only with respect to any fee arrangement contained therein, as contemplated by Fed. R. Bankr. P. 2019(c)(4);

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- b. The pertinent facts and circumstances concerning the formation and employment of the group or committee as contemplated by Fed. R. Bankr. P. 2019(c)(1); and
- c. To the extent relevant, the following additional data:
 - i. The full first and last name and personal address of each personal injury claimant or member of the group;
 - ii. The amount of the claim if liquidated, and for unliquidated claims, an indication that such claims are unliquidated; and
 - iii. The nature of the claim or interest. For claimants or members who assert or expect to assert a talc personal injury claim this information shall include (a) whether the claim arises from ovarian cancer or mesothelioma, and (b), if known, the stage of such disease.
- 4. If a 2019 Statement is filed under seal pursuant to paragraph 3 above, a modified/redacted version of the 2019 Statement and any exhibits thereto shall also be filed on the case docket. This version shall differ from the version of the 2019 Statement filed under seal only in the following respects:
 - a. For individual claimants or members, the first initial of the last name may be substituted for the full last name;
 - b. Any personal addresses may be redacted; and
 - c. For claimants or members who assert or expect to assert a talc personal injury claim, the disease information set forth in paragraph 3 (c) (iii) above may be redacted.
- 5. If any fact disclosed in any party's 2019 Statement changes materially, a verified supplemental or amended statement shall be filed (a "**2019 Supplement**") whenever such party takes

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a position before the court or solicits votes on the confirmation of a plan. *See* Fed. R. Bankr. P. 2019(d). The 2019 Supplement shall set forth the changes in the facts required to be included in the 2019 Statement as described in this Order, except that claimants or members who assert or expect to assert a Talc Personal Injury Claim shall not be required to supplement information related to the stage of disease disclosed.

6. The filing of a 2019 Statement and, if appropriate, a 2019 Supplement, that complies with this Order, as it may be amended from time to time, shall be deemed to be complete compliance with Rule 2019 for all purposes in these cases.

7. Access to 2019 Statements filed under seal shall be governed the same as “Confidential Information” under the Agreed Protective Order Governing Confidential Information (Dkt. 948), and shall be provided to the U.S. Trustee pursuant to 11 U.S.C. 107(c)(3).